

OEIS Data Request 9.1

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.1 Statistical Weather, Climate, and Wildfire Modeling

- (a) In its 2023 survey responses to questions 1.1.2 Q9 and 1.1.2 Q10, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. List the outputs and inputs of the weather, climate, and wildfire models currently used by PacifiCorp.
- (b) In its 2023 survey responses to questions 1.1.3 Q1, 1.1.3 Q2, 1.1.3 Q3, 1.1.3 Q4 and 1.1.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp have or plan to create a database to house version-controlled risk model outputs provided by its third-party vendor?
 1. Discuss why or why not.
 2. If it does plan to create a database to house version-controlled risk model outputs provided by its third-party vendor, provide an estimated completion date for creating the database.
 - iii. Does PacifiCorp provide any model inputs to its third-party vendor’s risk model(s)?
 - iv. Is PacifiCorp informed of model inputs used in its third-party vendor’s risk model(s)?
 1. If PacifiCorp is not informed of model inputs in its third-party vendor risk models, will the information be provided upon PacifiCorp’s request?
- (c) In its 2023 survey responses to questions 1.1.4 Q1, 1.1.4 Q2, and 1.1.4 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (d) In its 2023 survey responses to questions 1.1.5 Q8 and 1.1.5 Q9, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (e) In its 2023 survey responses to questions 1.1.7 Q7, and 1.1.7 Q8, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Explain PacifiCorp’s plan to validate changes to its modeling assumptions?

- (f) In its 2023 survey responses to questions 1.1.8 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (g) In its 2023 survey responses to questions 1.1.9 Q1, 1.1.9 Q2, 1.1.9 Q3, and 1.1.9 Q7, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (h) In its 2023 survey responses to questions 1.1.10 Q2, 1.1.10 Q3, 1.1.10 Q5, 1.1.10 Q6, 1.1.10 Q7, 1.1.10 Q8, and 1.1.10 Q9, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.1

(a) Please refer to the Company’s responses to subparts i. and ii. below:

- i. 1.1.2 Q9: PacifiCorp’s 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

In addition to the above, PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone. PacifiCorp updated its responses to these questions due to the absence of a documented plan to include this capability in future model iterations.

1.1.2 Q10: PacifiCorp’s 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

- ii. Inputs of the weather, climate, and wildfire models currently used by PacifiCorp are in Table B-5 on pages 394-396 in the Revised 2023-2025 Base Wildfire Mitigation Plan (WMP) – Revision 5 - Clean and presented in the below table:

Dataset	Spatial Resolution (Meters)	Start of Dataset	Dataset Update Frequency	Source
Landscape Characteristics				
Terrain	10		Yearly	United States Geological Survey (USGS)
Surface Fuels	30/10	2020	Pre-Fire Season, Monthly Update in Fire Season, End of Fire Season	Technosylva
Wildland Urban Interface (WUI) and Non-Forest Fuels Land Use	30/10	2020	Twice A Year	Technosylva
Canopy Fuels (CBD, CH, CC, CBH)	30/10	2020	Pre-Fire Season, Monthly Update in Fire Season, End of Fire Season	Technosylva
Roads Network	30		Yearly	USGS
Hydrography	30		Yearly	USGS

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

2025 WMPs/ PacifiCorp
 December 13, 2024
 OEIS-P-WMP_2024-PC-09

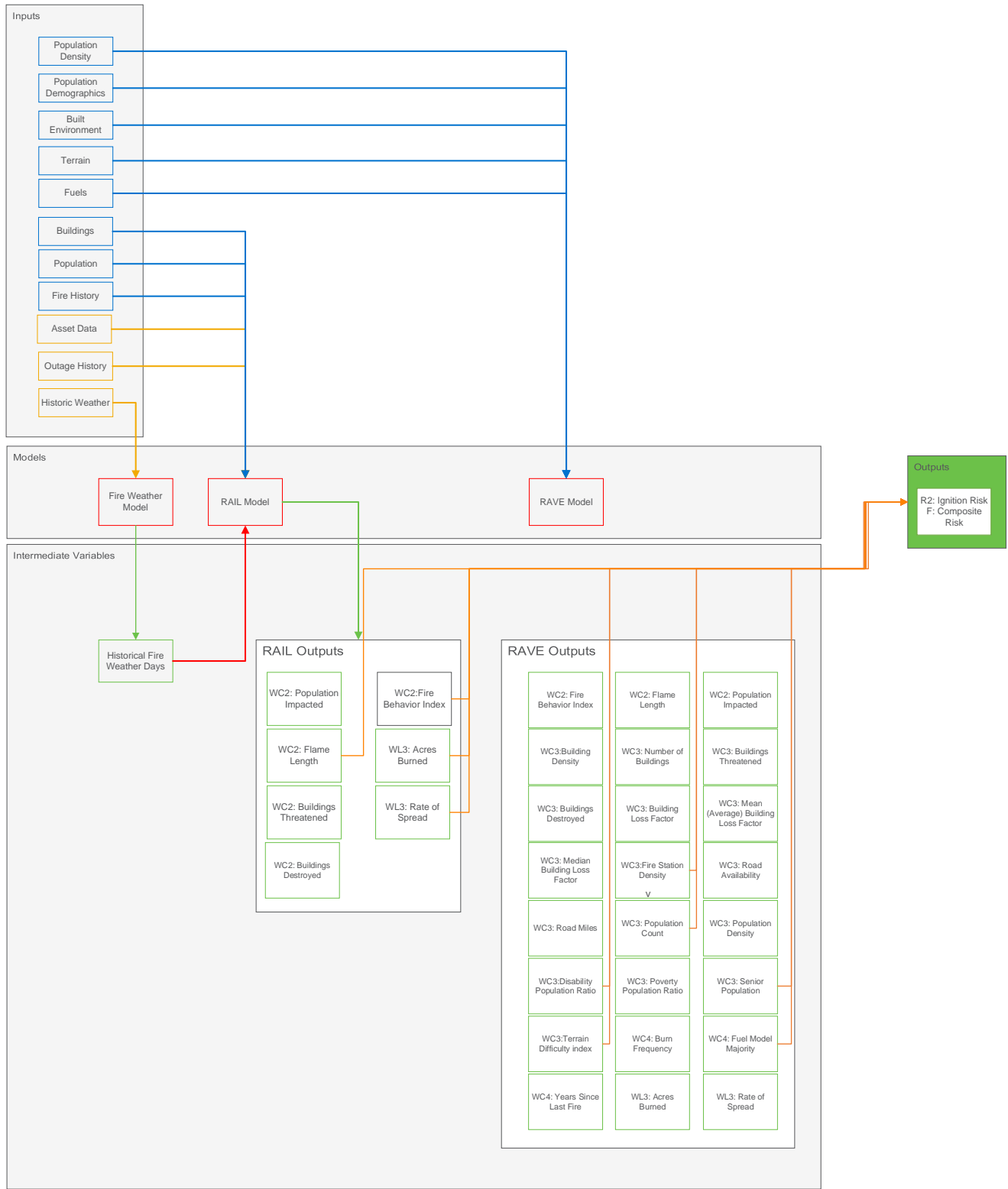
Dataset	Spatial Resolution (Meters)	Start of Dataset	Dataset Update Frequency	Source
Croplands	30	1997	Yearly	USDA
Weather And Atmospheric Data				
Wind Speed	2000	1990	Hourly / 96 Hour Forecast	Atmospheric Data Solutions (ADS)
Wind Direction	2000	1990	Hourly /96 Hour Forecast	ADS
Wind Gust	2000	1990	Hourly / 96 Hour Forecast	ADS
Air Temperature	2000	1990	Hourly / 96 Hour Forecast	ADS
Surface Pressure	2000	1990	Hourly / 96 Hour Forecast	ADS
Relative Humidity	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Precipitation	2000	1990	Hourly / 96 Hour Forecast	ADS
Radiation	2000	1990	Hourly / 96 Hour Forecast	ADS
Water Vapor Mixing Ratio 2 meter	2000	1990	Hourly / 96 Hour Forecast	ADS
Snow Accumulated – Observed	1000	2008	Daily	National Oceanic and Atmospheric Administration (NOAA)
Precipitation Accumulated - Observed	4000	2008	Daily	NOAA
Burn Scars	10	2000	5 Days	National Aeronautics and Space Administration (NASA)/ European Space Agency (ESA)
Weather Observations Data	Points	1990	10 Min	Synoptic
Fuel Moisture				
Herbaceous Live Fuel Moisture	250	2000	Daily / 5-Day Forecast	Technosylva
Woody Live Fuel Moisture	250	2000	Daily / 5-Day Forecast	Technosylva / ADS
1-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva / ADS
10-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva / ADS
100-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva / ADS
Values at Risk				
Buildings	Polygon Footprints	2020-21	Yearly	Microsoft/Technosylva
Damage Inspection (DINS)	Points	2014-21	Yearly	Cal Fire

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

Dataset	Spatial Resolution (Meters)	Start of Dataset	Dataset Update Frequency	Source
Population	90	2019	Yearly	LANDSCAN, Oak Ridge National Laboratory (ONRL)
Roads	Vector Lines	2021	Yearly	Caltrans
Social Vulnerability	Plexels	2021	Yearly	Esri Geoenrichment Service
Fire Stations	Points	2021	Yearly	Esri, USGS
Building Loss Factor	Building Footprints	2022	Yearly	Technosylva
Critical Facilities	Points	2021	Yearly	Fire Resource Assessment Program (FRAP), Cal Fire
Potential Ignition Locations				
Distribution & Transmission Lines	Linear Segments	2022	Updated Quarterly	PacifiCorp
Poles & Equipment	Points	2022	Updated Quarterly	PacifiCorp
Outage History	Points	1989	Annual	PacifiCorp
Ignition History	Points	2020	Annual	PacifiCorp
Fire Activity				
Hotspots MODIS	1000	2000	Twice A Day	NASA
Hotspots VIIRS	375	2014	Twice A Day	NASA
Hotspots GOES 16/17	3000	2019	10 Minute	NASA
Fireguard	Polygons	2020	15 Minute	National Guard
Fire Season Perimeters	Polygons	2021	Daily	National Incident Feature Service (NIFS)
Historic Fire Perimeters	Polygons	1900	Yearly	Cal Fire
Alert Wildfire Cameras	Live Feeds	Real Time	1 Minute	Alert Wildfire Consortium
Lighting Strikes	1000	Real Time	1 Minute	Earth Networks / Others

Outputs of the models are also shown in Figure B-6 on page 358 of the Revised 2023-2025 Base WMP – Revision 5 – Clean. Figure B-6 is presented below:

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.



Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- (b) Please refer to the Company's responses to subparts i. through iv. below:
- i. PacifiCorp's 2024 response reflects use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
 - ii. Yes.
 1. This database will be created to maintain version control of risk model outputs provided by the vendor to continue progression along risk modeling maturity milestones.
 2. Estimated date of completion is December 31, 2026.
 - iii. Yes. Please refer to the table provided in the Company's response to subpart (a) ii. above.
 - iv. Yes.
 1. Not applicable.
- (c) PacifiCorp's 2024 responses reflect current state of project planning and program development to meet these maturity survey milestones. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp does not currently intend to fund independent research and will continue to participate in industry collaboration to further its understanding of best practices. PacifiCorp notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.**
- (d) Upon further review of the related vendor documentation PacifiCorp updated its response to 1.1.5 Q8 and Q9 to more accurately align with the vendor model.
- (e) Please refer to the Company's responses to subparts i. and ii. below:
- i. PacifiCorp's 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide "Yes" responses when it is able to support a "Yes" response

with documentation, approved project or program plans by the vendor, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.

- ii. PacifiCorp will continue to work with its modeling vendor to review and discuss changes to modeling assumptions as part of future product enhancements or modifications documented in the vendor product roadmap.
- (f) PacifiCorp reinterpreted the question in 2024 and as a practice does not currently make the non-spatial risk data public, but it is available through data request which is why the Company changed its answer.
- (g) PacifiCorp's 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans by the vendor, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.
- (h) The FireSight risk model that PacifiCorp uses is owned and operated by a third-party vendor, who is responsible for validation and version control of the model. As the model is owned by a third party, the source code is proprietary. PacifiCorp updated its response to 1.1.10 Q8 and Q9 based on more current information. PacifiCorp notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.

OEIS Data Request 9.2

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.2 Calculation of Wildfire and PSPS Risk Exposure for Societal Values

- (a) In its 2023 survey responses to questions 1.2.2 Q4, 1.2.2 Q5, 1.2.2 Q10, 1.2.2 Q11, 1.2.2 Q12, and 1.2.2 Q14, PacifiCorp responded "Yes" for 2025. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. List the outputs and inputs of the wildfire and PSPS risk exposure models currently used by PacifiCorp.
- (b) In its 2023 survey responses to questions 1.2.3 Q1, 1.2.3 Q2, 1.2.3 Q4, and 1.2.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp have or plan to create a database to house version-controlled risk model outputs provided by its third-party vendor?
 1. Discuss why or why not.
 2. If so, provide an estimated completion date for the database.
 - iii. Does PacifiCorp provide any model inputs to its third-party vendor’s risk models?
 - iv. If PacifiCorp only provides some or none of the model inputs to its third-party vendor’s risk models, is PacifiCorp informed of all the model inputs to its third-party vendor’s risk models?
 1. If PacifiCorp is not informed of the model inputs to its third-party vendor risk models, can the third-party vendor provide the information to PacifiCorp upon PacifiCorp’s request?
- (c) In its 2023 survey responses to questions 1.2.4 Q1, 1.2.4 Q2, and 1.2.4 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to questions 1.2.6 Q5, 1.2.6 Q7, and 1.2.6 Q8, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

“Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.2

- (a) Please refer to the Company’s responses to subparts i. and ii. below:
- i. PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. At the time of submission, PacifiCorp did not have a public safety power shutoff (PSPS) risk model in production and could not indicate “Yes” when wildfire risk and PSPS models are included in the question.
 - ii. Please refer to the Company’s response to subpart (a)i. above. At the time of this response, PacifiCorp currently does not have a PSPS risk model in production.
- (b) Please refer to the Company’s responses to subparts i. through iv. below:
- i. PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp uses vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
 - ii. Please refer to the Company’s responses to subparts 1. and 2. below:
 1. Yes.
 2. Estimated date of completion is December 31, 2026.
 - iii. Yes.
 - iv. Yes.
 1. Not applicable.
- (c) At the time of submission, PacifiCorp did not have a formal process in place to conduct internal subject matter expert review of location specific long-term wildfire risk model outputs or compare model results to other utility model outputs where

- similar wildfire risk conditions are present. PacifiCorp updated its responses to these questions due to the absence of documentation demonstrating completion of the maturity survey milestone or a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.
- (d) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
- PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.

OEIS Data Request 9.3

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.3 Calculation of Community Vulnerability to Wildfire and Public Safety Power Shutoffs

- (a) In its 2023 survey responses to questions 1.3.1 Q3 and 1.3.1 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to questions 1.3.2 Q5 and 1.3.2 Q7, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (c) In its 2023 survey responses to questions 1.3.3 Q1, 1.3.3 Q2, 1.3.3 Q3 and 1.3.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp have or plan to create a database to house version-controlled community vulnerability model outputs provided by its third-party vendor?
 1. Discuss why or why not.
 2. If so, provide an estimated completion date for the database.
 - iii. Does PacifiCorp provide any model inputs to its third-party vendor’s community vulnerability models?
 - iv. If PacifiCorp only provides some or none of the model inputs to its third-party vendor’s risk models, is PacifiCorp informed of all model inputs to its third-party vendor’s community vulnerability models?
 - v. If PacifiCorp is not informed of model inputs to its third-party vendor community vulnerability models, can the inputs be provided upon PacifiCorp’s request?
- (d) In its 2023 survey response to question 1.3.4 Q1, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (e) In its 2023 survey responses to questions 1.3.6 Q2, 1.3.6 Q5, 1.3.6 Q7 and 1.3.6 Q8, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.3

- (a) PacifiCorp does not have a formal process in place to conduct internal subject matter expert (SME) review of discrepancies between forecasted and observed community vulnerability to wildfire and public safety power shutoff (PSPS) risk or automatically integrate those changes into its vendor provided wildfire risk model or PSPS risk model.
- PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with**

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.
- (b) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp does not have sufficient verified data on redundancy capabilities or collaborative community wildfire preparedness initiatives to include as inputs into its PSPS risk model. PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.
- (c) Please refer to the Company's responses to subparts i. through iv. below:
- i. The 2024 responses reflect use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
 - ii. Yes.
 1. This database will be created to maintain version control of risk model outputs provided by the vendor to continue progression along risk modeling maturity milestones.
 2. Estimated date of completion is December 31, 2026.
 - iii. No.
 - iv. Yes.
 1. Not applicable.
- (d) PacifiCorp does not have a formal process in place to conduct internal SME review of vendor model calculations. PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.

- (e) The Company's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.

OEIS Data Request 9.4

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.4 Calculation of Risk and Risk Components

- (a) In its 2023 survey responses to questions 1.4.1 Q2 and 1.4.1 Q4 PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- (b) In its 2023 survey responses to questions 1.4.2 Q2, 1.4.2 Q3, 1.4.2 Q4, 1.4.2 Q5, 1.4.2 Q6, and 1.4.2 Q7, PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded "no" for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- (c) In its 2023 survey responses to questions 1.4.2 Q6, and 1.4.2 Q7, PacifiCorp responded "Yes" for 2026. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- (d) In its 2023 survey responses to questions 1.4.3 Q1, 1.4.3 Q2 and 1.4.3 Q4, PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025 and 2026.

- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (j) In its 2023 survey responses to questions 1.4.7 Q6 and 1.4.7 Q9, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (k) In its 2023 survey responses to questions 1.4.9 Q1, 1.4.9 Q2, 1.4.9 Q7, and 1.4.9 Q9, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.4

- (a) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.
- (b) PacifiCorp does not compare life safety, reliability, affordability, property protection, resiliency, or environmental protection on a relative basis in its updated wildfire risk scoring methodology. Wildfire risk score calculations do account for potential impacts to people and property through use of FireSight outputs related to population characteristics and the number of structures present. PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.
- (c) PacifiCorp does not compare life safety, reliability, affordability, property protection, resiliency, or environmental protection on a relative basis in its updated wildfire risk scoring methodology. Wildfire risk score calculations do account for

- potential impacts to people and property through use of FireSight outputs related to population characteristics and the number of structures present. PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.
- (d) PacifiCorp intends to deploy a database to maintain and control risk model outputs by December 31, 2026.
- (e) Please refer to the Company’s responses to subparts i. and ii. below:
- i. PacifiCorp provides the vendor with datasets extracted from its system of record for asset information, system topology, and outage history. These data extracts are retrained on SharePoint for future reference.
 - ii. PacifiCorp provides the vendor with datasets extracted from its system of record for asset information, system topology, and outage history. This data transfer is not directly linked to PacifiCorp databases.
- (f) At the time of submission, PacifiCorp did not have a formal process in place to conduct internal subject matter expert (SME) review of location specific long-term wildfire risk model outputs or engage an independent, third-party to review its risk maps. PacifiCorp does not currently plan to fund independent research on wildfire risk modeling. PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.
- (g) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. Wildfire risk models do account for ignition likelihood from contact with objects and vegetation through use of PacifiCorp outage data.

PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp

notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.

PacifiCorp’s 2024 responses reflect availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.

- (h) Wildfire risk model outputs are controlled by the vendor implemented prior to the processing and delivery of each annual data set which does not necessarily align with the wildfire mitigation plan (WMP) filing cycle. At the time of submission, PacifiCorp did not have insight into its 2026 delivery timeline.
- (i) Wildfire risk model outputs are controlled by the vendor implemented prior to the processing and delivery of each annual data set which does not necessarily align with the WMP filing cycle. At the time of submission, PacifiCorp did not have insight into its 2026 delivery timeline.

PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.

OEIS Data Request 9.5

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.5 Risk Event Tracking and Integration of Lessons Learned

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- (a) In its 2023 survey response to question 1.5.1 Q1, PacifiCorp responded “No” for 2024. In its 2024 response to the same question, PacifiCorp responded “Yes” for 2024.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to questions 1.5.1 Q2 and 1.5.1 Q3, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “no” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (c) In its 2023 survey responses to question 1.5.2 Q2, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Question 1.5.2 Q2 asked “Are wildfire- and PSPS-related risk events formally tracked in the electrical corporation corrective action program?” Explain why wildfire- and PSPS-related risk events are not formally tracked in the electrical corporation corrective action program.
- (d) In its 2023 survey responses to question 1.5.3 Q3, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Question 1.5.3 Q3 asked “Are actions to prevent recurrence formally documented and tracked within the electrical corporation’s WMP?” Explain why these actions are not tracked within the electrical corporation’s WMP.
- (e) In its 2023 survey responses to questions 1.4.7 Q6 and 1.4.7 Q9, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (f) In its 2023 survey responses to question 1.5.3 Q1 PacifiCorp responded “2 (within one year) and 4 (within one quarter)” for 2025 and 2026 respectively. In its 2024 responses to the same question, PacifiCorp responded “1 (never) and 2 (at least annually) for 2025 and 2026, respectively.
 - i. Explain why PacifiCorp changed each of its responses to these questions in the 2024 survey.
- (g) In its 2023 survey responses to question 1.5.4 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (h) In its 2023 survey responses to questions 1.5.5 Q1, 1.5.5 Q2, and 1.5.5 Q3 PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (i) In its 2023 survey responses to questions 1.5.6 Q1, 1.5.6 Q2, 1.5.6 Q3, and 1.5.6 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.5

- (a) PacifiCorp does not have a process in place to automatically include risk events in a corrective action program or automatically prioritize risk events for subject matter expert review. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.**

- (b) PacifiCorp does not have a process in place to automatically include risk events into model quality and validation. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.**
- (c) Please refer to the Company’s responses to subparts i. and ii. below:
- i. PacifiCorp reviewed the question and determined that there was no formal plan to include wildfire and public safety power shutoff (PSPS) related risk event tracking within the corrective action program.
PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.
 - ii. Currently, PacifiCorp collects information on utility-related incidents such as ignitions and outages and performs analysis of the incidents. Based on the results of the analysis, there may be updates to company material or construction standards. Asset management policies and procedures, or no additional action if it was determined the equipment performed as expected.
- (d) Please refer to the Company’s responses to subparts i. and ii. below:
- i. PacifiCorp interprets this as a question regarding Maturity Survey Question 1.5.2 Q3. Based on the foregoing interpretation, the Company responds as follows:

PacifiCorp reviewed the question and determined that there was no formal plan to include recurrence prevention tracking within the Wildfire Mitigation Plan for 2025 and 2026.
 - ii. PacifiCorp interprets this as a question regarding Maturity Survey Question 1.5.2 Q3. Based on the foregoing interpretation, the Company responds as follows:

PacifiCorp does track ignition incidents internally in the incident tracking database but did not include this data in the 2023-2025 Base Wildfire Mitigation Plan (WMP).

- (e) Wildfire risk model outputs are controlled by the vendor implemented prior to the processing and delivery of each annual data set which does not necessarily align with the WMP filing cycle. At the time of submission, PacifiCorp did not have insight into its 2026 delivery timeline.
- (f) Upon further review, PacifiCorp determined it does not have a process in place to formally track risk events as part of corrective action program.
- (g) PacifiCorp's 2024 responses reflect use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
- (h) Upon further review, PacifiCorp determined it does not have operational practices or processes in place to integrate lessons learned from risk events to improve its wildfire mitigation program. Currently, PacifiCorp collects information on utility-related incidents such as ignitions and outages and performs analysis of the incidents. Based on the results of the analysis, there may be updates to company material or construction standards. Asset management policies and procedures, or no additional action if it was determined the equipment performed as expected.
- (i) Upon further review, PacifiCorp determined it does not have a process in place to complete these tasks as part of a corrective action program.

OEIS Data Request 9.6

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.6 Risk-Informed Wildfire Mitigation Strategy

- (a) In its 2023 survey responses to questions 1.6.1 Q1, 1.6.1 Q3, and 1.6.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to questions 1.6.1 Q5, 1.6.1 Q6, and 1.6.1 Q8, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (c) In its 2023 survey responses to questions 1.6.2 Q4, 1.6.2 Q5, and 1.6.2 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (d) In its 2023 survey responses to question 1.6.3 Q1 PacifiCorp responded “2 (at least annually) and 3 (twice per year)” for 2025 and 2026 respectively. In its 2024 responses to the same question, PacifiCorp responded “2 (at least annually) for 2025 and 2026.”
 - i. Explain why PacifiCorp changed its responses to this question in the 2024 survey.

- (e) In its 2023 survey responses to questions 1.6.4 Q1, 1.6.4 Q2, 1.6.4 Q3, and 1.6.4 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (f) In its 2023 survey responses to questions 1.6.5 Q2, 1.6.5 Q4, 1.6.5 Q5, 1.6.5 Q6, and 1.6.5 Q8 PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (g) In its 2023 survey response to question 1.6.5 Q7, PacifiCorp responded “No” for 2025. In its 2024 response to the same question, PacifiCorp responded “Yes” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “No” in the 2023 survey to “Yes” in the 2024 survey.

- (h) In its 2023 survey response to question 1.6.7 Q1, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.

- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (i) In its 2023 survey responses to questions 1.6.7 Q2, 1.6.7 Q4, 1.6.7 Q5, 1.6.7 Q7, and 1.6.7 Q8, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (j) In its 2023 survey responses to questions 1.6.8 Q2, 1.6.8 Q3, 1.6.8 Q5, 1.6.8 Q6, and 1.6.8 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (k) In its 2023 survey response to question 1.6.8 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.6

- (a) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**
- (b) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp does not have a formal process in place to conduct internal subject matter expert (SME) review of discrepancies between forecasted and observed risk estimations. **PacifiCorp updates its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with**

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor or the Company.
- (c) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**
 - (d) PacifiCorp's 2024 responses reflect updated intentions for future wildfire risk buy-down estimates and management review periodicities.
 - (e) PacifiCorp's 2024 responses reflect use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record. As discussed in responses above, PacifiCorp intends to deploy a database to maintain and control risk model outputs by December 31, 2026.
 - (f) At the time of submission, PacifiCorp did not have a formal process in place to conduct internal or external SME review of risk reduction estimates or observations.
 - (g) PacifiCorp began participating in recurring meetings with other utilities to discuss risk reduction estimates for various wildfire mitigation in 2024 and expects to continue doing so in 2025.
 - (h) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling documentation in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional documentation becomes available in the future. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide "Yes" responses when it is able to support a "Yes" response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**

- (i) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**
- (j) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**
- (k) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**

OEIS Data Request 9.7

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 2 Situational Awareness and Forecasting

- (a) In its 2023 survey responses to question 2.1.1 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- (b) In its 2023 survey responses to question 2.2.5 Q5, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Will PacifiCorp begin implementing the usage of ensemble weather forecasting (using varying initial conditions in which one is the control forecast) after Jan 1, 2026?

Response to OEIS Data Request 9.7

- (a) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. PacifiCorp notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**
- (b) Please refer to the Company’s responses to subparts i. and ii. below:
- (c) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. **PacifiCorp updated its responses to these questions due to the absence of a documented plan to complete these maturity survey milestones. The Company notes that it will provide “Yes” responses when it is able to support a “Yes” response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone by the vendor.**
- i. Yes.

OEIS Data Request 9.8

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

**Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 3.1 Asset Inventory and Condition Database**

- (a) In its 2023 survey responses to question 3.1.1 Q1, PacifiCorp responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to question 3.1.1 Q2, PacifiCorp responded that it would update its database weekly in 2025 and daily in 2026. In its 2024 survey responses to the same question, PacifiCorp responded that it would update the database monthly in 2025 and 2026. PacifiCorp stated that this response changed due to a “business transformation delay.”
- i. Describe the business transformation delay, including the replaced and replacement technologies.
 - ii. Provide the expected completion date of the business transformation.
 - iii. Provide the expected frequency that the database will be updated once the business transformation is complete.
- (c) In its 2023 survey response to question 3.1.1 Q3, PacifiCorp responded that it would incorporate asset inspection findings into its database within one day in 2026. In its 2024 survey response to the same question, PacifiCorp responded that it would incorporate inspection findings within one week in 2026.
- i. Explain why PacifiCorp changed its response to this question from one day in the 2023 survey to one week in the 2024 survey.
- (d) In its 2023 survey responses to question 3.1.2 Q1, PC responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question, PC responded “No.” PacifiCorp stated that this response changed due to a “business transformation delay.”
- i. Will PacifiCorp’s database contain the information listed in question 3.1.2 Q1 after the business transformation is complete?
- (e) In its 2023 survey responses to question 3.1.2 Q3, PacifiCorp responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question,

PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey. What business processes, if any, changed for PacifiCorp to provide a different response for 2024?
 - ii. Does the database contain the overload history for each piece of equipment in the service territory through which current passes? If not, list the equipment and/or circumstances for which the overload history is not recorded.
- (f) In its 2023 survey response to question 3.1.2 Q7, PC responded that at least 90 percent of its assets and components would have age data in 2025 and 2026. In its 2024 response to the same question, PC responded that less than 80 percent of its assets would contain age data in 2025 and 2026.
- i. Explain why PacifiCorp changed its response to this question. What business processes, if any, changed for PacifiCorp to provide a different response for 2024?
 - ii. What percentage of assets and components does PacifiCorp have age data for?
 - iii. List the assets or components PacifiCorp does not track age data for (i.e., poles, splices, conductor, hotline clamps.)
 - iv. List the assets and components PacifiCorp does track age data for.
 - v. Does PacifiCorp expect to increase the percentage of assets and components it has age data for from 2024 to 2025?

Response to OEIS Data Request 9.8

- (a) There are no current plans to provide a one-day quality assurance/quality control of conditions found during inspections. Five percent of transmission and distribution overhead inspections are audited for each district. The 5 percent is a mix of inspections with no conditions found and those with conditions found.
- (b)
 - i. See response to OEIS 9.8 subpart b, iii.
 - ii. See response to OEIS 9.8 subpart b, iii.
 - iii. The change to Question 3.1.1 Q2 of the maturity survey is based on the worst-case scenario for the time it would take data to be updated to the database. The Company has a daily process that loads data from internal inspection applications

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

into the mainframe. These internal records are usually uploaded within 48 business hours.

PacifiCorp's response to business transformation assumes the Company will no longer have this check-in / check-out delay in the new system of record. April 2027 is the new estimated 'go-live' date. The expected frequency for database updates in the new system will be daily.

- (c) As stated in the Company's response to subpart (b) iii above, the business transformation which incorporates the assets, inspections, and conditions within the same system will allow for the inspection findings to be incorporated within one day. The current system requires the asset to be checked out and the conditions uploaded in batches, which could happen within one week of the inspection but could happen sooner.
- (d) Currently the Company's asset information does not contain lifespan of the equipment and the expectation is that will be included when the new system goes live.
- (e) Please refer to the Company's responses to subparts i. and ii. below:
 - i. The response was changed to "No" as this information is only captured for devices that have Supervisory Control and Data Acquisition (SCADA), which is not available on all pieces of equipment.
 - ii. There will be many devices installed where current passes that do not have SCADA which could be comprised of fuses, switches, reclosers and relays. In the event that the asset does not have telemetry data being captured there is not the ability to record overload history for the device.
- (f) Please refer to the Company's responses to subparts i. through v. below:
 - i. At the time of completing the maturity survey the assumption was that the age of the equipment was unknown for more than 20 percent of the assets and that there would not be much change in the data collected for the older assets. Given the changes in practices with recording asset install dates over time, the Company revised this estimate to be less than 80 percent.
 - ii. Overhead Distribution – 100 percent
Overhead Local Transmission – 99.5 percent
Overhead Main Grid Transmission – 99.9 percent
Underground – 80.4 percent

Substation Assets – 64 percent

- iii. Please refer to the Company’s response to subpart (f) iv. below.
- iv. Please refer to Attachment OEIS 9.8 which provides the table of assets and components and percentage of assets with age data. PacifiCorp’s current practice is to capture dates, but that information may not be present for older equipment installed under old practices. For example, for load tap changers, the manufacturer date was tracked on the parent asset (Regulator and Transformer) and was not converted to the new load tap changer assets in Maximo.
- v. The percentage of equipment with age data is expected to increase as new equipment is installed and the data captured. With each year and with each asset inspection, the Company tries to fill in data gaps when feasible.

OEIS Data Request 9.9

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.2 Asset Inspections

- (a) In its 2023 survey response to question 3.2.2 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No”.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. How does PacifiCorp calculate equipment failure probability? Please provide an example calculation for a distribution pole in a high-risk circuit, an expulsion fuse in a medium-risk circuit, and a transformer in a low-risk circuit.
- (b) In its 2023 survey response to question 3.2.2 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No”.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.9

- (a) Please refer to the Company’s responses to subparts i. and ii. below:
 - i. PacifiCorp does not have measured parameters that support establishing equipment failure probabilities currently or plan to have them in the future and the Company adjusted responses to reflect that.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- ii. PacifiCorp does not have a calculation for equipment failure probability and there is not a business initiative to create a probability of failure value.
- (b) The response was updated because the inspections are planned based on the modeling that generated the high fire risk area risk map and not off dynamic measured parameters.

OEIS Data Request 9.10

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.3 Asset Maintenance and Repair

- (c) In its 2023 survey response to question 3.3.3 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp plan to estimate equipment service life reduction based on usage and environmental conditions in the future?
- (d) In its 2024 survey response to question 3.3.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (e) In its 2024 survey response to question 3.3.3 Q6, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (f) In its 2024 survey response to question 3.3.4 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (g) In its 2024 survey response to question 3.3.4 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.10

- (a) Please refer to the Company’s responses to subparts i. and ii. below:
 - i. PacifiCorp changed the responses because the company does not have an estimated service life reduction based on usage and environmental factors. There is not a current plan to implement a service life reduction based on those factors.
 - ii. PacifiCorp does not have a current plan to implement a service life reduction for equipment based on environmental factors and usage. However, the company does use alternate materials for coastal locations that considers coastal environmental factors compared to inland locations.
- (b) Asset maintenance activities are only assessed twice a year and that process will continue to remain the same.
- (c) Asset maintenance activities are only assessed twice a year and that process will continue to remain the same.
- (d) Maintenance activities are not used to calculate a risk reduction based on the maintenance prioritization.
- (e) Risk buy downs are not factored into maintenance activities. Maintenance intervals are dependent on the type of equipment and maintenance performed in accordance with PacifiCorp’s maintenance policies.

OEIS Data Request 9.11

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.1 Protective Equipment and Device Settings

- (h) In its 2023 survey responses to questions 5.1.1 Q1, 5.1.1 Q2, 5.1.1 Q3, 5.1.1 Q4 and 5.1.1 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (i) In its 2023 survey responses to questions 5.1.2 Q2, 5.1.2 Q3, and 5.1.2 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

questions, PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (j) In its 2023 survey response to question 5.1.3 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.11

- (a) The responses were changed because construction projects were delayed with the expectation to have the capability within 2026. The question was in relation to all recloser devices which requires the reclosers to be replaced.
- (b) The answer was changed as it requires new devices to be installed which are part of construction projects that had been delayed. The expectation is this ability will be available in 2026.
- (c) This functionality requires new devices and communications to be installed which were part of the delayed construction projects. The expectation is that this functionality will be available in 2026.

OEIS Data Request 9.12

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.2 Incorporation of Ignition Risk Factors in Grid Control

- (k) In its 2023 survey response to question 5.2.1 Q1, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (l) In its 2023 survey responses to questions 5.2.2 Q1 and 5.2.2 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (m) In its 2023 survey response to questions 5.2.3 Q2, 5.2.3 Q3, and 5.2.3 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same questions, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (n) In its 2023 survey response to question 5.2.5 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.12

- (a) Upon further review, PacifiCorp determined it did not have a program in place reduce the expected life of assets based on grid operating history or an approved plan to do so.
- (b) Upon further review, PacifiCorp determined it did not have a program in place to track this information for use in wildfire risk mitigation or an approved plan to do so.
- (c) Upon further review, PacifiCorp determined it did not have a program in place to track this information or an approved plan to do so.
- (d) Upon review of the 2023 Survey, the Company’s response should have been “No” in the 2023 submittal.

OEIS Data Request 9.13

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.3 PSPS Operating Model

- (o) In its 2023 survey response to question 5.3.2 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.13

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

While PacifiCorp reviews other utility best practices as individual lessons learned and standard practices, there is no standard process to test applicability of all other utility standard processes. Many other utilities processes are not applicable to PacifiCorp's standard practices due to differing technologies and service territories.

OEIS Data Request 9.14

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.5 Ignition Prevention and Suppression

- (a) In its 2023 survey responses to questions 5.5.1 Q1, 5.5.1 Q4, and 5.5.1 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.14

- (a) Upon further review, PacifiCorp determined it does not have a program in place to formally complete these actions or an approved plan to do so.

OEIS Data Request 9.15

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.1 Wildfire and PSPS Emergency and Disaster Preparedness Plan

- (a) In its 2023 survey responses to question 6.1.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey response to question 6.1.4 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.15

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- (a) While PacifiCorp workshops PacifiCorp's Emergency Response Plan with local public safety partners to ensure alignment and deconflict assumptions, PacifiCorp does not have input on how much of the Emergency Response Plan is incorporated within each public safety partner's own emergency plan. Through experience, PacifiCorp has discovered that much of the Company's Emergency Response Plan does not overlap or apply to 75 percent or more of local public safety partner emergency operations.
- (b) PacifiCorp includes external partners in the development and updating of the Emergency Response Plan. PacifiCorp undertakes an internal planning effort and does not currently have an external third-party evaluation of the plan every five years. PacifiCorp cannot answer "Yes" to multiple consecutive years as this evaluation is on a five-year cadence. The goal will be to conduct an evaluation in 2026.

OEIS Data Request 9.16

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.3 Public Emergency Communication Strategy

- (a) In its 2023 survey responses to question 6.3.1 Q3, PacifiCorp responded "Yes" for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded "No."
 - i. Explain why PacifiCorp changed each of its responses to this question from "Yes" in the 2023 survey to "No" in the 2024 survey.
- (b) In its 2023 survey responses to question 6.3.4 Q6, PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded "No."
 - i. Explain why PacifiCorp changed each of its responses to this question from "Yes" in the 2023 survey to "No" in the 2024 survey.
- (c) In its 2023 survey responses to question 6.3.4 Q14, PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded "No."
 - i. Explain why PacifiCorp changed each of its responses to this question from "Yes" in the 2023 survey to "No" in the 2024 survey.
- (d) In its 2023 survey responses to question 6.3.4 Q16, PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same question,

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.16

- (a) PacifiCorp has internal weather forecasting information available to all partners at all times and shares event specific information, but it is not “automated” as the question asks.
- (b) PacifiCorp does not provide support services within one hour of all wildfire detection in all areas of the service territory, as there is often not a need. PacifiCorp works with the local public safety partners to determine actual support needs and locations for those needs. PacifiCorp cannot not answer “Yes” due to the differing nature of a wildfire detection and public safety power shutoff (PSPS) event that could potentially impact customers.
- (c) PacifiCorp shares general public information on progress but does not plan to share detailed operational practices such as the location of staff currently or in the future for safety reasons.
- (d) PacifiCorp does not currently or plan to in the future to share cyberattack information at any point in time, including during wildfires or PSPS events.

OEIS Data Request 9.17

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.5 Customer Support in Wildfire and PSPS Emergencies

- (a) In its 2023 survey responses to question 6.5.1 Q12, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.17

PacifiCorp changed its responses due to the Company’s confusion around the wording of the question. It was unclear how to interpret the question and so the Company decided to change the answers to “No” because of that.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

OEIS Data Request 9.18

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.3 Engagement with AFN and Socially Vulnerable Populations

- (a) In its 2023 survey responses to question 7.3.1 Q7, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.18

PacifiCorp maintains relationships with community partners in all counties. Depending on how this question is interpreted, if all public safety partners count as community partners, then PacifiCorp does maintain relationships with at least four community partners in all counties. The survey references public safety partners separately in other sections, therefore this question was interpreted as only community-based organization partners, non-governmental organizations, and service providers to the access and functional needs community. The rural nature of PacifiCorp’s service territory makes it challenging to find that number of partners in all counties. PacifiCorp continues efforts to increase the number of partnerships, and to this end, the Company added a new Access and Functional Needs (AFN) program manager in June 2024.

OEIS Data Request 9.19

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.4 Collaboration on Local Wildfire Mitigation Planning

- (a) In its 2023 survey responses to question 7.4.1 Q5, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to question 7.4.1 Q6, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

- (c) In its 2023 survey responses to question 7.4.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to question 7.4.1 Q8, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.19

- (a) PacifiCorp maintains relationships with community partners in all counties. Depending on how this question is interpreted, if all public safety partners count as community partners, then PacifiCorp does maintain relationships with at least four community partners in all counties. The survey references public safety partners separately in other sections, therefore this question was interpreted as only community-based organization partners, non-governmental organizations, and service providers to the access and functional needs community. The rural nature of PacifiCorp’s service territory makes it challenging to find that number of partners in all counties. PacifiCorp continues efforts to increase the number of partnerships, and to this end, the Company added a new Access and Functional Needs (AFN) program manager in June 2024.
- (b) PacifiCorp provides feedback for local wildfire mitigation planning activities in counties where available. There are four counties in the PacifiCorp service territory, but not all have local wildfire mitigation planning efforts, therefore there is not an opportunity to provide feedback to at least four planning activities.
- (c) The frequency of the effort is based on requests from local community partners and PacifiCorp is not familiar with planning cycles of each plan. The assumption is that the effort is based on the update cycle of the respective planning effort. The interpretation was “No” due to not meeting the minimum of four efforts in question 7.4.1 Q6 of the maturity survey.
- (d) PacifiCorp does take an active and proactive role in supporting local wildfire mitigation planning managed by local community partners. The interpretation was “No” due to not meeting the minimum of four efforts in question 7.4.1 Q6 of the maturity survey.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

OEIS Data Request 9.20

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.5 Cooperation and Best Practice Sharing with Other Electrical Corporations

- (e) In its 2023 survey responses to question 7.5.1 Q5, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (f) In its 2023 survey responses to question 7.5.1 Q6, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (g) In its 2023 survey response to question 7.5.3 Q1, PacifiCorp responded “Yes” for 2024. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to question 7.5.3 Q5, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.20

- (a) While PacifiCorp continues to engage with other utilities to informally share information related to best practices, PacifiCorp changed its response to reflect that the Company is not currently participating in a formal, scheduled forum for sharing best practices (e.g. a workshop) comparing asset inspection, maintenance and repair procedures, training, and lessons learned with other electrical corporations.
- (b) While PacifiCorp continues to engage with other utilities to informally share information related to best practices, PacifiCorp changed its response to reflect that

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

the Company is not currently participating in a formal, scheduled forum for sharing best practices (e.g. a workshop) comparing vegetation inspection, management, treatment procedures, training, and lessons learned with other electrical corporations.

- (c) While PacifiCorp continues to engage with other utilities to informally share information related to best practices, PacifiCorp changed its response to reflect that the Company is not currently participating in a formal, scheduled forum for sharing lessons learned with other California electrical corporations and implementing information from other electrical corporations regarding ignition prevention and suppression.
- (d) PacifiCorp changed its response to reflect that the Company does not plan to have a standard process for testing applicability of best practices and lessons learned of other electrical corporations in 2025 and 2026.

OEIS Data Request 9.21

Regarding Projected Expenditure Increase for Initiative WP-01: Wildfire Mitigation Strategy Development

In Table 2-3 of PacifiCorp's 2025 WMP Update, PacifiCorp stated that it will increase its projected expenditures for Initiative WP-01 by \$301,000 (a 55 percent increase).

- (a) What timeframe is the \$301,000 expense estimated to cover?
 - i. Is it estimated to cover the year 2025 alone?
 - ii. Is it estimated to cover the entire cost of a multiyear contract? If so, which years is the contract estimated to cover?
- (b) In previous years, what was the expense amount for the Independent Evaluator?
 - i. What was the expense in the year 2020?
 - ii. What was the expense in the year 2021?
 - iii. What was the expense in the year 2022?
 - iv. What was the expense in the year 2023?
 - v. What was the expense in the year 2024?

Response to OEIS Data Request 9.21

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- (a) Please refer to the Company's responses to subparts i. and ii. below:
- i. Yes, the \$301,000 expense estimated is to cover 2025 alone.
 - ii. No. The estimate is to only cover the cost for one year of a multi-year contract. The independent evaluator (IE) multi-year contract is for 2024-2026.
- (b) Please refer to the Company's responses to subparts i. through v. below:
- i. Actuals were \$0.
 - ii. Actuals were \$261,000.
 - iii. Actuals were \$237,000.
 - iv. Actuals were \$250,000.
 - v. Actuals were \$297,000.

OEIS Data Request 9.22

Regarding Independent Evaluator Initiative Category Reclassification - In its response to Data Request OEIS-P-WMP_2024-PC-02 Question 1 (vi), PacifiCorp stated that "The independent evaluator (IE) requirement came out of the passing of Assembly Bill 1054 and codified in Public Utilities Code - PUC § 8386.3 and required a qualified independent evaluator with experience to review and assess electrical corporations' compliance with its Wildfire Mitigation Plan."

- (a) Given that Assembly Bill 1054 became effective January 1, 2020,¹ what initiative category did PacifiCorp allocate the independent evaluator expense to from 2020 through the present?
- i. Why is PacifiCorp requesting to switch the independent evaluator cost from the aforementioned initiative category to initiative WP-01 in its 2025 WMP Update?

Response to OEIS Data Request 9.22

- (a) The independent evaluator (IE) expenses prior to 2024 were not allocated to a specific initiative in the wildfire mitigation plan (WMP).
- i. The IE initiative and costs were not included in any of the previous WMPs or reporting but are now being included in the plan to be associated with the WP-01 initiative in the 2025 WMP Update.

¹ AB-1054 Public utilities: wildfires and employee protection (https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB1054, accessed Nov. 18, 2024). Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

2025 WMPs/ PacifiCorp
December 13, 2024
OEIS-P-WMP_2024-PC-09

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.